

REMARKS

As a preliminary matter, Applicants thank the Examiner for the continued allowance of claims 2-6 and 9-14.

Claims 7 and 15-16 stand rejected under 35 U.S.C. 102(e) as being anticipated by Whitcher et al. (U.S. 6,144,552). With respect to independent claim 7, and its dependent claim 15, Applicants respectfully traverse the rejection because the cited reference does disclose (or suggest) an electrically insulating bezel that has a flat plate which directly receives a front surface of a display panel.

Whitcher discloses a hand held computer system that includes a front housing 15 and a screen assembly 73. The housing 15 includes a somewhat flat frame-shaped outer surface 21, having a central opening 22, and a protruding flange 23 extending rearward from the outer surface. The screen assembly 73 includes a screen module/monitor 75, which Whitcher teaches can be an LCD device, but always includes a front frame 81 and a gasket 113 mounted between the LCD panel of the device and the front frame 15. Whitcher does not show or describe that the screen 75 itself, or its front surface, is directly received into the flat plate frame shape of the housing 15. Quite the contrary, Whitcher clearly shows that both the gasket 113 and the front frame 81 physically intervene to prevent the housing 15 from directly receiving the screen 75, along with any panel-shaped module component superposed on a rear surface of the screen 75.

In contrast, independent claim 7 of the present invention has been amended to clarify that the flat plate frame of the electrically insulating bezel directly receives a set of the display panel and the panel-shaped module component superposed on the rear surface of a display panel. As discussed above, Whitcher does not teach (or suggest) such features, and even specifically teaches away from such a configuration. The illustrations from Whitcher that were cited by the Examiner (Figs. 1-2) clearly show that the surface 21 of the housing 15 does not directly receive the screen module 75, or the rear housing 17 that the Examiner asserts to be analogous to the panel-shaped module component of the present invention. The gasket 113 of the front frame 81 both physically intervene to prevent direct reception of the screen 75 into the flat plate frame shape 21 of the housing 15. Similarly, the protruding flange 23 also physically intervenes to prevent direct contact between the rear housing 17 and the flat plate frame of the housing 15. Because neither of the set of the rear housing 17 and the screen 75 can be directly received by the 'frame' portion of the front housing 15, the Section 102 rejection of independent claim 7 (and its dependent claim 15) based on Whitcher is respectfully traversed.

With respect to independent claim 16 of the present invention, however, Applicants respectfully traverse the rejection because Whitcher fails to disclose (or suggest) an electrically insulating bezel that encloses the display panel and the panel-shaped module component. The Examiner asserts that Whitcher's front housing 15 is analogous to the bezel of the present invention, that the screen assembly 73 as a whole is analogous to the display

panel of the present invention, and that the rear housing 17 is analogous to the panel-shaped module component of the present invention. Even if, for the purposes of this discussion only, these analogies by the Examiner were correct (which Applicants do not concede), the Examiner has still not established a *prima facie* case of anticipation against claim 16 of the present invention based on Whitcher.

Claim 16 recites that the electrically insulating bezel encloses both the display panel and the panel-shaped module component so as to couple the module component to the display panel. Whitcher's front housing 15, however, does not enclose both the screen assembly 73 and the rear housing 17. Figs. 1-3 of Whitcher all clearly show that the front housing 15 merely abuts and contacts the rear housing 17, but never *encloses* the rear housing. Whitcher's front housing 15 and rear housing 17 connect together to form the single housing 13. Neither of these two housing components though are ever shown to enclose the other. Accordingly, a *prima facie* case of anticipation has not been established against independent claim 16 of the present invention, and therefore the outstanding rejection should be withdrawn.

Claim 17 also stands rejected under 35 U.S.C. 102(e) as being anticipated by Whitcher. Applicants respectfully traverse this rejection for at least the reasons discussed above in traversing the rejection of claim 16 based on Whitcher. Claim 17 recites at least the same features discussed above, namely, that the bezel of the present invention encloses both the display panel and the panel-shaped module component. Accordingly, for at least these

reasons, a *prima facie* case of obviousness has not been established against claim 17, and the rejection thereto should therefore be withdrawn.

Additionally, the rejection of claim 17 based on Whitcher is further deficient because claim 17 recites a housing as an additional and distinct component from the display panel, the panel-shaped module component, and the electrically insulating bezel of the present invention. The Examiner, however, has not identified any analogous housing within the Whitcher reference. The Examiner asserts that Whitcher's housing 13 is analogous to the housing of the present invention but, as explained above, Whitcher's housing 13 does not indicate a separate component from the front housing 15 and the rear housing 17, but only the *assembled combination* of these two front housing and rear housing components. In other words, Whitcher's "housing" 13 is not a separate component from the front housing 15 and the rear housing 17, but merely a convenience designation of the two components together.

Claim 17 of the present invention, on the other hand, clearly recites a housing as a separate component from the display panel, the module component, and the bezel, and even further recites that all three of these components are incorporated within the housing. Accordingly, because Whitcher fails to teach (or suggest) a housing element separately from elements 15, 17, and 73, and because Whitcher fails to show any one housing element that within itself contains all three other elements of the panel, module component, and bezel, a *prima facie* case of anticipation has also not been established against claim 17, and the rejection should therefore be withdrawn.

Claims 7 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Yun et al. (U.S. 5,835,139) in view of Beatty et al. (U.S. 5,233,502). Applicants respectfully traverse this rejection because neither of the cited references, whether taken alone or in combination, teaches or suggests an electrically insulating member coupled to the electrically insulating bezel so as to hold the display panel and the module component against the flat plate frame, as in claim 7 of the present invention, as amended.

Yun illustrates in Fig. 6 that only the second support frame 400 could be accurately interpreted to be coupled to the first fastening frame 190 so as to hold the LCD panel 300 against the frame 190. Yun, however, specifically teaches that the second support frame 400 is made of *metal* (col. 4, lines 38-39, 49-51), and therefore cannot be electrically insulating. In at least this regard therefore, Yun specifically teaches away from the present invention, and therefore must be excluded as a prior art reference in an obviousness rejection.

Beatty is cited by the Examiner merely for disclosing a flat plate and/or a wall extending from the rear surface of a flat plate for an electrically insulating bezel. Beatty, however, fails to teach or suggest an additional electrically insulating member coupled to the electrically insulating bezel so as to hold the LCD panel and the module component against the flat plate frame of the bezel. In fact, Beatty does not even teach or suggest that the display panel and module component identified by the Examiner are held against the flat plate frame. Figs. 1-2 of Beatty actually show the opposite.

Figs. 1-2 of Beatty show the display device 4 being inserted into an opening of a wall that extends rearward from the front of the cover member 3. The display device 4, however, does not then move forward to be held against the flat frame portion of the cover member 3, but is instead held at the side wall portions of the device by the biasing force of the tongue portions 13, and by the insertion of the integral connector 8 into the positioning sockets 11 or 12. The flat plate identified by the Examiner in Beatty therefore does not *directly* receive the set of the display panel and the panel shaped module component, and therefore the Section 103 rejection of claim 7 (and 15) is deficient on its face under Section 2143.03 of the MPEP.

Furthermore, the Examiner has not identified a motivation taught or suggested within the prior art references themselves for combining the two references. In a rejection based on obviousness, the motivation for combining multiple references is an additional element that the Examiner is required to cite to within the prior art references. In the present case, however, the Examiner has not done so. Moreover, the Examiner has not even asserted a rationale for *how* Beatty could be combined with Yun, when the two references teach two very different, and incompatible, device configurations. For at least these additional reasons therefore, the Section 103 rejection of claims 7 and 15 is deficient on its face, and should be withdrawn.

Lastly, the Section 103 rejection of claims 7 and 15 is further traversed because neither one of the two cited references, alone or together, can realize all of the advantages of

the present invention. According to the recited configuration of the present invention, a display panel is held against a flat frame portion of an electrically insulating bezel between the bezel and an electrically insulating member. This advantageous configuration therefore better enables the present invention to suppress radiation of electromagnetic waves than would either of the cited prior art references. It is important to note that Beatty is silent regarding any material for a member coupled to the bezel to hold the panel and module to the bezel. Without such a specific teaching or suggestion in this regard, there could be no rationale for combining Beatty with Yun to describe the electrically insulating member of the present invention, or its particular configuration as recited in claim 7. Accordingly, for these still further reasons, the Section 103 rejection is traversed.

New claim 18 has been added to recite an additional combination of features of the present invention, and is dependent from independent claim 7. Consideration on the merits, entry, and allowance of new claim 18 are respectfully requested.

For all of the foregoing reasons, Applicants submit that this Application, including claims 2-7 and 9-18, is in condition for allowance, which is respectfully requested.

The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Customer No. 24978

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300 South Wacker Drive
Suite 2500
Chicago, Illinois 60606
Telephone: (312) 360-0080
Facsimile: (312) 360-9315

P:\DOCS\2500\65689\795400.DOC

Respectfully submitted,
GREER, BURNS & CRAIN, LTD.

By


Josh C. Snider
Registration No. 47,954